

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Application of BNP Paribas Jersey Trust :  
Corporation Ltd for an Order Pursuant to : Case No. 18-mc- \_\_\_\_  
28 U.S.C. § 1782 to Conduct Discovery for :  
Use in Foreign Proceedings :  
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**EX PARTE APPLICATION OF BNP PARIBAS JERSEY TRUST CORPORATION LTD FOR  
AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO CONDUCT DISCOVERY FOR USE  
IN FOREIGN PROCEEDINGS**

Based upon the concurrently filed Memorandum of Law; the Declaration of Jacob S. Pultman dated February 8, 2018, and the exhibits appended thereto; and the Declaration of Brandon D. O'Neil dated February 8, 2018; BNP Paribas Jersey Trust Corporation Ltd ("BNP Jersey") hereby applies to this Court for an Order, pursuant to 28 U.S.C. § 1782 and Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, granting BNP Jersey leave to take discovery from Gurr Johns, Inc. and to serve the subpoena attached as Exhibit A to the Proposed Order filed herewith.

Dated: New York, NY  
February 8, 2018

Respectfully submitted,

/s/ Jacob S. Pultman

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